



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

May 17, 2011

National Park Service
Denver Service Center – Transportation Division
Attention: F-Line Draft EIS Planning Team
Post Office Box 25287
Denver, Colorado 80225-0287

Subject: Draft Environmental Impact Statement for the Extension of F-Line Streetcar Service to Fort Mason Center, Golden Gate National Recreation Area, San Francisco Maritime National Historical Park, California (CEQ# 20110079)

Dear Planning Team:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the F-Line Streetcar Service Extension, published by the National Park Service, the San Francisco Municipal Transportation Agency, and the Federal Transit Administration. Our review is pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

The SFMTA proposes to extend the San Francisco Municipal Railway F-Market and Wharves Line (F-Line) approximately 0.85 miles west from the intersection of Jefferson and Jones Streets to the west side of Fort Mason Center. The Draft EIS analyzes the environmental impacts of the No Action Alternative 1 and two options for Action Alternative 2: Alternative 2A – North Loop Turnaround, which would locate the streetcar turnaround in the Fort Mason parking lot, and Alternative 2B – South Loop Turnaround, which would locate the turnaround in the Great Meadow. The Draft EIS also analyzes the environmental impacts of 8 to 9 station platforms and upgrades to the historic Fort Mason Tunnel.

The EPA supports improving local and regional transit service connections to National Park Service attractions. Of the two Action Alternatives analyzed, the EPA believes Alternative 2A, identified as the Preferred Alternative in the Draft EIS, will result in fewer environmental and community impacts because it is less disruptive to land and existing vegetation, has a lower rate of construction-related emissions, is less likely to conflict with bicycles, automobiles, and pedestrians, and will not increase impervious area when compared to Alternative 2B.

The EPA has rated the Draft EIS as LO, *Lack of Objections*. See attached "Summary of the EPA Rating System" for a description of this rating. The basis for this rating and our recommendations are detailed in our comments below. While we have not identified areas requiring substantive changes to the document, we have identified opportunities for further analyzing and mitigating the project's potential environmental impacts.

Air Quality

The proposed project is located in the Bay Area Air Quality Management District, which is in non-attainment for ozone and particulate matter (PM₁₀ and PM_{2.5}). Therefore, we recommend all construction and operation emissions be mitigated to the extent feasible. The EPA commends NPS, SFMTA, and FTA for committing to best management practices recommended by BAAQMD for mitigating the impact of construction on air quality.

Extending the F-Line will improve transit access to the historic sites, restaurants, employment centers, and numerous event spaces located around Fort Mason Center, the Great Meadow, and the National Maritime Historical Park. The EPA commends the NPS, SFMTA, and FTA for proposing to increase transit modal share which would likely contribute to long-term air quality improvements in the region. As noted in the Draft EIS, this project could contribute to a decrease in local vehicle emissions, including criteria air pollutants and greenhouse gases, as people shift from using cars to using transit.

The EPA appreciates the thorough analysis of traffic flow and parking impacts in the Marina District neighborhood resulting from the project. The Draft EIS notes that the project will have short- and long-term, minor to negligible adverse impacts on transportation conditions due to its proposal to convert existing street lanes to shared streetcar lanes, reduce on-street parking spaces, and convert a portion of the Fort Mason parking lot into a streetcar station platform and turnaround. The Draft EIS notes that the beneficial effect of cumulative projects, like the Fisherman's Wharf Public Realm Plan, which proposes to divert traffic from Jefferson Street, would likely offset the project's impact on transportation conditions in the area. In addition, the Draft EIS proposes four mitigation measures to improve traffic flow and safety: optimizing traffic signal timing, installing wayfinding devices, reconfiguring on-street parking spaces, and implementing parking time restrictions.

Without taking these mitigating factors into account, a conservative analysis in the Draft EIS shows that the Level of Service at certain intersections of the project's in-street segment could downgrade if it was built. Specifically, the intersection of Leavenworth and Jefferson Streets would downgrade from LOS A to D during weekday PM peak hours and from LOS B to F during weekend mid-day peak hours. LOS would also downgrade to a lesser extent at the intersections of Leavenworth and Beach Streets and Polk and Beach Streets. Based on these findings, the EPA is concerned about the project's potential air quality impacts resulting from increased vehicle congestion.

Therefore, the EPA recommends the following:

Recommendations:

- Include in the Final Environmental Impact Statement a discussion of the potential air quality impacts of increased vehicle congestion at the affected in-street segment of the project.
- Provide more detail in the Final EIS on how cumulative projects could mitigate vehicle congestion in the area.
- In the Final EIS and Record of Decision, commit to implementing the four mitigation measures discussed above to improve traffic flow and safety. These mitigation measures will likely have an indirect benefit to the project's potential long-term air quality impacts.
- As practicable and advantageous, identify in the Final EIS mitigation measures to directly reduce adverse air quality impacts from increased congestion.

Green Design and Operations

Infrastructure Reuse

The EPA commends the NPS, SFMTA, and FTA for proposing the F-Line Extension as an infrastructure reuse project with considerable cultural benefits. Alternative 2's proposal to rehabilitate historic streetcars and the Fort Mason Tunnel makes modern day use of materials and infrastructure that might otherwise deteriorate in disrepair. Rehabilitating existing infrastructure preserves natural resources by decreasing the demand for virgin materials and reduces greenhouse gas emissions and energy use by decreasing demand for energy intensive construction and manufacturing.

Green Infrastructure

The EPA encourages NPS, SFMTA, and FTA to implement "green infrastructure," such as bioretention areas, vegetated swales, porous pavement, and filter strips in any onsite storm water management features. These features can serve as both storm water treatment and visual enhancements. More detailed information on these forms of "green infrastructure" can be found at http://cfpub.epa.gov/npdes/home.cfm?program_id=298.

We appreciate the opportunity to review this Draft EIS and look forward to future coordination on the project. When the Final EIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at 415-947-4161 or dunning.connell@epa.gov.

Sincerely,



Connell Dunning, Transportation Team Leader
Environmental Review Office

Enclosure: Summary of the EPA Rating Definitions

CC via email: Frank Dean, Golden Gate National Recreation Area, National Park Service
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SUMMARY OF THE EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. The EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. The EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for the EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

The EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. The EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From the EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

